

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

GE HFS HOLDINGS, INC., f/k/a )  
HELLER HEALTHCARE FINANCE, )  
INC., )

Plaintiff, )

And )

MICHAEL INGOLDSBY, )

Intervenor/Plaintiff, )

Civil Action No. 05-CV-11128-NG

v. )

NATIONAL UNION FIRE )  
INSURANCE COMPANY OF )  
PITTSBURGH, PA., and )  
INTERNATIONAL INSURANCE )  
GROUP, LTD., )

Defendants. )

**NATIONAL UNION FIRE INSURANCE COMPANY OF  
PITTSBURGH, PA'S MOTION FOR ENTRY OF SEPARATE FINAL JUDGMENT**

Pursuant to Fed. R. Civ. P. Rule 54(b), Defendant National Union Fire Insurance Company of Pittsburgh, PA ("National Union"), one of two defendants in the above-entitled action, hereby moves for entry of separate final judgment. In support of its Motion, National Union relies upon its Memorandum in Support filed herewith.

For the reasons set forth therein, National Union respectfully requests that this Court make an express determination that there is no just reason for delay and direct entry of a separate

final judgment, in the form attached to the Memorandum in Support as Exhibit A, dismissing all claims against National Union.

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA

By its attorneys,

Dated: August 21, 2008

/s/ M. Machua Millett  
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M. Machua Millett (BBO# 648574)  
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**CERTIFICATE OF SERVICE**

I, M. Machua Millett, hereby certify that on this 21st day of August, 2008, I served a copy of the foregoing document on counsel of record via ECF.

/s/ M. Machua Millett  
M. Machua Millett